

FEB 19 2025

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA)	DOCKET NO. 3:25-CR-18-KDB
)	
v.)	
)	<u>BILL OF INDICTMENT</u>
1) ELVER AGUIRRE GARCIA)	Violations:
2) DIONISIO AGUIRRE GARCIA)	21 USC § 846
3) FRANCISCO ARROLLO SILVA)	21 USC § 841(a)(1)
a/k/a "Alexander Pineda Figueroa")	18 USC § 2
)	

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Distribute Methamphetamine)

From in or around June 2024 and continuing until on or about December 2024, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

- 1) ELVER AGUIRRE GARCIA,
- 2) DIONISIO AGUIRRE GARCIA, and
- 3) FRANCISCO ARROLLO SILVA a/k/a "Alexander Pineda Figueroa,"

did knowingly and intentionally combine, conspire, confederate and agree with each other, and others, both known and unknown to the Grand Jury, to distribute quantities of methamphetamine, a Schedule II controlled substance, and in violation of Title 21, United States Code, Section 841(a)(1).

Quantity of Methamphetamine Involved

It is further alleged that, with respect to the conspiracy offense charged in Count One, fifty (50) grams or more of "actual" methamphetamine, a Schedule II controlled substance, are attributable to, and were reasonably foreseeable by 1) ELVER AGUIRRE GARCIA 2) DIONISIO AGUIRRE GARCIA and 3) FRANCISCO ARROLLO SILVA a/k/a "Alexander Pineda Figueroa." Accordingly, Title 21, United States Code, Section 841(b)(1)(A) is applicable to 1) ELVER AGUIRRE GARCIA 2) DIONISIO AGUIRRE GARCIA and 3) FRANCISCO ARROLLO SILVA a/k/a "Alexander Pineda Figueroa."

COUNT TWO
(Distribution of Methamphetamine)

On or about June 25, 2024, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

1) ELVER AGUIRRE GARCIA

aiding and abetting other persons, known and unknown to the Grand Jury, did knowingly and intentionally distribute a quantity of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18 United States Code, Section 2.

Quantity of Methamphetamine Involved

It is further alleged that, with respect to defendant **1) ELVER AGUIRRE GARCIA**, the offense charged in Count Two involved at least fifty (50) grams of “actual” methamphetamine. Accordingly, Title 21, United States Code, Section 841(b)(1)(A) applies.

COUNT THREE
(Distribution of Methamphetamine)

On or about July 3, 2024, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

2) DIONISIO AGUIRRE GARCIA

aiding and abetting other persons, known and unknown to the Grand Jury, did knowingly and intentionally distribute a quantity of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18 United States Code, Section 2.

Quantity of Methamphetamine Involved

It is further alleged that, with respect to defendant **2) DIONISIO AGUIRRE GARCIA**, the offense charged in Count Three involved at least fifty (50) grams of “actual” methamphetamine. Accordingly, Title 21, United States Code, Section 841(b)(1)(A) applies.

COUNT FOUR
(Distribution of Methamphetamine)

On or about July 10, 2024, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

- 1) ELVER AGUIRRE GARCIA, and**
- 2) DIONISIO AGUIRRE GARCIA**

aiding and abetting each other and other persons, known and unknown to the Grand Jury, did knowingly and intentionally distribute a quantity of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18 United States Code, Section 2.

Quantity of Methamphetamine Involved

It is further alleged that, with respect to defendants **1) ELVER AGUIRRE GARCIA** and **2) DIONISIO AGUIRRE GARCIA**, the offense charged in Count Four involved at least fifty (50) grams of "actual" methamphetamine. Accordingly, Title 21, United States Code, Section 841(b)(1)(A) applies.

COUNT FIVE
(Distribution of Methamphetamine)

On or about September 2, 2024, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

- 2) DIONISIO AGUIRRE GARCIA, and**
- 3) FRANCISCO ARROLLO SILVA a/k/a "Alexander Pineda Figueroa"**

aiding and abetting each other and other persons, known and unknown to the Grand Jury, did knowingly and intentionally distribute a quantity of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18 United States Code, Section 2.

Quantity of Methamphetamine Involved

It is further alleged that, with respect to defendants **2) DIONISIO AGUIRRE GARCIA** and **3) FRANCISCO ARROLLO SILVA a/k/a "Alexander Pineda Figueroa"** the offense charged in Count Five involved at least fifty (50) grams of "actual" methamphetamine. Accordingly, Title 21, United States Code, Section 841(b)(1)(A) applies.

COUNT SIX
(Distribution of Methamphetamine)

On or about September 19, 2024, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

2) DIONISIO AGUIRRE GARCIA, and
3) FRANCISCO ARROLLO SILVA a/k/a “Alexander Pineda Figueroa”

aiding and abetting each other and other persons, known and unknown to the Grand Jury, did knowingly and intentionally distribute a quantity of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18 United States Code, Section 2.

Quantity of Methamphetamine Involved

It is further alleged that, with respect to defendants **2) DIONISIO AGUIRRE GARCIA** and **3) FRANCISCO ARROLLO SILVA a/k/a “Alexander Pineda Figueroa”** the offense charged in Count Six involved at least fifty (50) grams of “actual” methamphetamine. Accordingly, Title 21, United States Code, Section 841(b)(1)(A) applies.

COUNT SEVEN
(Distribution of Methamphetamine)

On or about December 19, 2024, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

2) DIONISIO AGUIRRE GARCIA, and
3) FRANCISCO ARROLLO SILVA a/k/a “Alexander Pineda Figueroa”

aiding and abetting each other and others, known and unknown to the Grand Jury, did knowingly and intentionally distribute a quantity of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18 United States Code, Section 2.

Quantity of Methamphetamine Involved

It is further alleged that, with respect to defendants **2) DIONISIO AGUIRRE GARCIA** and **3) FRANCISCO ARROLLO SILVA a/k/a “Alexander Pineda Figueroa”** the offense charged in Count Seven involved at least fifty (50) grams of “actual” methamphetamine. Accordingly, Title 21, United States Code, Section 841(b)(1)(A) applies.

NOTICE OF FORFEITURE AND FINDING OR PROBABLE CAUSE

Notice is hereby given of the provisions of Title 21, United States Code, Section 853, Title 18, United States Code, Section 924, and Title 28, United States Code, Section 2461(c). The following property is subject to forfeiture in accordance with Sections 853, 924, and/or 2461(c):

- a. All property which constitutes or is derived from proceeds of the violations set forth in this Superseding Bill of Indictment;
- b. All property used or intended to be used in any manner or part to commit or facilitate such violations;
- c. All firearms or ammunition involved or used in such violations; and
- d. If, as set forth in Title 21, United States Code, Section 853(p), any property described in (a), (b), or (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a), (b), and (c).

The Grand Jury finds probable cause to believe that the following property is subject to forfeiture on one or more of the grounds stated above:

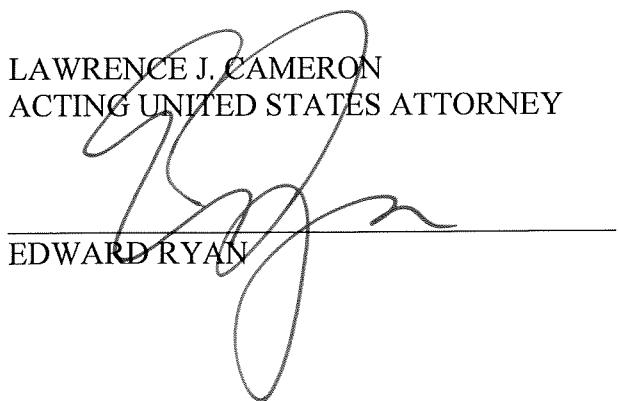
- a. Approximately \$490,020.00 in United States Currency seized on or about August 22, 2024.

A TRUE BILL

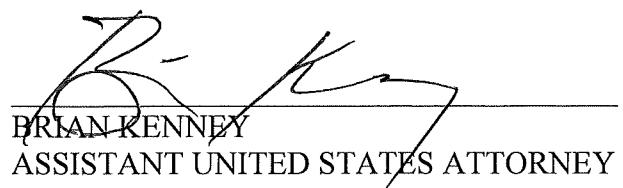


FOREPERSON

LAWRENCE J. CAMERON
ACTING UNITED STATES ATTORNEY


EDWARD RYAN

ASSISTANT UNITED STATES ATTORNEY


BRIAN KENNEY
ASSISTANT UNITED STATES ATTORNEY